

FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

AUG 27 2015 *ll*
AUG 27, 2015
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

ANDREW SHELTON,

a/k/a "Manki,"

ELGIN LIPSCOMB,

a/k/a "Rat,"

WARREN GATES,

a/k/a "Chuck,"

ALEXANDER PEEBLES,

a/k/a "Adolf," "A-dog," "Ace,"

LORI SHELTON,

TERRY WALKER,

a/k/a "Tito,"

PATRICK EDWARDS,

a/k/a "Big Pat,"

DANDRE MOODY,

FREDERICK LEWIS,

a/k/a "Macboney" and

MARCEL TURNER,

a/k/a "Soup," "Low End"

) No. 15 CR 350

) Violations: Title 18, United States

) Code, Sections 659, 922(g)(1), and (j)

) Second Superseding Indictment

JUDGE THARP

MAGISTRATE JUDGE GILBERT

COUNT ONE

The SPECIAL JANUARY 2015 GRAND JURY charges:

On or about April 12, 2015, at Chicago, in the Northern District of Illinois,

Eastern Division,

ANDREW SHELTON,

a/k/a "Manki,"

ELGIN LIPSCOMB,

a/k/a "Rat,"

ALEXANDER PEEBLES,
a/k/a "Adolf," "A-dog," "Ace,"
TERRY WALKER,
a/k/a "Tito,"
PATRICK EDWARDS,
a/k/a "Big Pat,"
DANDRE MOODY,
FREDERICK LEWIS,
a/k/a "Macboney," and
MARCEL TURNER,
a/k/a "Soup," "Low End,"

defendants herein, each having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, which firearm had traveled in interstate commerce prior to each defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about April 12, 2015, at Chicago, in the Northern District of Illinois,
Eastern Division,

ANDREW SHELTON,
a/k/a "Manki,"
ELGIN LIPSCOMB,
a/k/a "Rat,"
ALEXANDER PEEBLES,
a/k/a "Adolf," "A-dog," "Ace,"
TERRY WALKER,
a/k/a "Tito,"
PATRICK EDWARDS,
a/k/a "Big Pat,"
DANDRE MOODY,
FREDERICK LEWIS,
a/k/a "Macboney," and
MARCEL TURNER,
a/k/a "Soup," "Low End,"

defendants herein, did knowingly receive, possess, conceal, and store a stolen
firearm which firearm had been shipped in interstate commerce, knowing and
having reasonable cause to believe that the firearm was stolen;

In violation of Title 18, United States Code, Section 922(j).

COUNT THREE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about April 12, 2015, at Chicago, in the Northern District of Illinois,
Eastern Division,

ANDREW SHELTON,
a/k/a "Manki,"
ELGIN LIPSCOMB,
a/k/a "Rat,"
ALEXANDER PEEBLES,
a/k/a "Adolf," "A-dog," "Ace,"
TERRY WALKER,
a/k/a "Tito,"
PATRICK EDWARDS,
a/k/a "Big Pat,"
DANDRE MOODY,
FREDERICK LEWIS,
a/k/a "Macboney," and
MARCEL TURNER,
a/k/a "Soup," "Low End,"

defendants herein, did steal, unlawfully take, carry away, and conceal from a railroad car, with intent to convert to their own use, goods moving as, which were part of, and which constituted an interstate shipment of freight and other property, having a value in excess of \$1,000, namely, approximately 104 Ruger firearms with a total value of approximately \$51,000.

In violation of Title 18, United States Code, Section 659.

COUNT FOUR

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about June 9, 2015, at Chicago, in the Northern District of Illinois,
Eastern Division,

ANDREW SHELTON,
a/k/a "Manki,"

defendant herein, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Glock Model 22, .40 caliber pistol, bearing serial number EKG135US, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about June 11, 2015, at South Chicago Heights, in the Northern District of Illinois, Eastern Division,

WARREN GATES,
a/k/a "Chuck,"

defendant herein, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, (1) a Ruger .22 caliber pistol, bearing serial number 490-63367, (2) a Ruger .22 caliber pistol, bearing serial number 490-63104, (3) a Ruger .22 caliber pistol, bearing serial number 490-63103, (4) a Ruger .22 caliber pistol, bearing serial number 490-63471, (5) a Ruger .22 caliber pistol, bearing serial number 490-63494, (6) a Ruger .22 caliber pistol, bearing serial number 490-63520, (7) a Taurus .44 caliber revolver, bearing serial number FS621919, (8) a US Arms .44 caliber revolver, bearing serial number A003240, (9) a Iver Johnson .30 caliber pistol, bearing serial number BA01860, (10) a Smith and Wesson .44 caliber revolver, bearing serial number AJF6421, (11) a Astra .22 caliber pistol, bearing serial number 153446, (12) a Sears M-200 shotgun, bearing serial number P294512, and (13) a Liegeoise D'Armes shotgun, bearing serial number 12499, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about June 11, 2015, at South Chicago Heights, in the Northern District of Illinois, Eastern Division,

WARREN GATES,
a/k/a "Chuck,"

defendant herein, did knowingly receive, possess, conceal, and store a stolen firearm, namely, (1) a Ruger .22 caliber pistol, bearing serial number 490-63367, (2) a Ruger .22 caliber pistol, bearing serial number 490-63104, (3) a Ruger .22 caliber pistol, bearing serial number 490-63103, (4) a Ruger .22 caliber pistol, bearing serial number 490-63471, (5) a Ruger .22 caliber pistol, bearing serial number 490-63494, and (6) a Ruger .22 caliber pistol, bearing serial number 490-63520, which firearm had been shipped in interstate commerce, knowing and having reasonable cause to believe that the firearm was stolen;

In violation of Title 18, United States Code, Section 922(j).

COUNT SEVEN

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about June 9, 2015, at Chicago, in the Northern District of Illinois,
Eastern Division,

LORI SHELTON,

defendant herein, did knowingly receive, possess, conceal, and store a stolen firearm, namely, (1) a Ruger .22 caliber pistol, bearing serial number 490-63599, (2) a Ruger .22 caliber pistol, bearing serial number 490-63624, and (3) a Ruger .22 caliber revolver, bearing serial number 577-26144, which firearm had been shipped in interstate commerce, knowing and having reasonable cause to believe that the firearm was stolen;

In violation of Title 18, United States Code, Section 922(j).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2015 GRAND JURY further charges:

1. The allegations contained in this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. As a result of the violation of Title 18, United States Code, Section 922(g)(1) and (j), as alleged in the foregoing indictment,

ANDREW SHELTON,
a/k/a "Manki,"
ELGIN LIPSCOMB,
a/k/a "Rat,"
WARREN GATES,
a/k/a "Chuck,"
ALEXANDER PEEBLES,
a/k/a "Adolf," "A-dog," "Ace,"
LORI SHELTON,
TERRY WALKER,
a/k/a "Tito,"
PATRICK EDWARDS,
a/k/a "Big Pat,"
DANDRE MOODY,
FREDERICK LEWIS,
a/k/a "Macboney," and
MARCEL TURNER,
a/k/a "Soup," "Low End,"

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest defendant may have in any property involved in the charged offense.

3. The interest of defendant subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), are the 104 Ruger firearms stolen on April 12, 2015 and associated ammunition, as well as the following firearms: (1) a Ruger .22 caliber pistol, bearing serial number 490-63367, (2) a Ruger .22 caliber pistol, bearing serial number 490-63104, (3) a Ruger .22 caliber pistol, bearing serial number 490-63103, (4) a Ruger .22 caliber pistol, bearing serial number 490-63471, (5) a Ruger .22 caliber pistol, bearing serial number 490-63494, (6) a Ruger .22 caliber pistol, bearing serial number 490-63520, (7) a Taurus .44 caliber revolver, bearing serial number FS621919, (8) a US Arms .44 caliber revolver, bearing serial number A003240, (9) a Iver Johnson .30 caliber pistol, bearing serial number BA01860, (10) a Smith and Wesson .44 caliber revolver, bearing serial number AJF6421, (11) a Astra .22 caliber pistol, bearing serial number 153446, (12) a Sears M-200 shotgun, bearing serial number P294512, (13) a Liegeoise D'Armes shotgun, bearing serial number 12499, (14) a Glock Model 22, .40 caliber pistol, bearing serial number EKG135, (15) a Ruger .22 caliber pistol, bearing serial number 490-63599, (16) a Ruger .22 caliber pistol, bearing serial number 490-63624, and (17) a Ruger .22 caliber revolver, bearing serial number 577-26144.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28,
United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY